

Cleveland since the existing permit on 271C2 is herein proposed to be deleted. Note, channel 271C at Monroe will be fully spaced to second-adjacent channel 269C2 at Cleveland by 83.24 kilometers.

2. **CH 266C Kanab, UT – Proposed channel 266C Indian Springs, NV.**

KPLD currently operates on channel 266C. The distance between the proposed allotment of channel 264C from Monroe to Enoch is 54.26 kilometers while 105 kilometers are required to be fully spaced. This creates a prohibited short space of 50.74 kilometers. The Joint Parties propose to eliminate this conflict by deleting channel 266C at Kanab and allocating it to Indian Springs, NV on co-channel 266C. The distance between the licensed sites of KPLD on channel 266C and the proposed reference coordinates for the allotment of channel 266C at Indian Springs is 287.44 kilometers while 290.0 kilometers is required to be fully spaced. This creates a prohibited short space or MX spacing of 2.56 kilometers. Thus, the move to Indian Springs is MX and permitted. The allotment of channel 266C at Indian Springs creates a short space to the permitted and licensed facilities of KPKK Amargosa Valley, NV, that requires a spectrum modification. Also, presently Kanab has only KPLD as a local service. In order to provide uninterrupted service to the community of Kanab, the Joint Parties propose to replace service with CH 276C from Hurricane, UT.

(a) **CH 266C Amargosa Valley, NV (KPKK) – Proposed channel 276C Amargosa Valley, NV.**

KPKK currently operates on channel 266C1 with a CP for channel 266C. The distance between the CP site of KPKK (on channel 266C) and the proposed allotment of channel 266C for KPLD at Indian Springs is 0.00 kilometers while 290 kilometers are required to be fully spaced. This creates a prohibited short space of 290.0 kilometers. The Joint Parties propose to eliminate this short spacing by deleting channel 266C at Amargosa Valley and substituting open channel 276C for use by KPKK at a modified site. The allocation of Ch 276C at Amargosa Valley requires one spectrum modification: Hurricane, UT presently has a CP to operate on channel 276C at a site that is short spaced to KPKK on channel 276C at Amargosa Valley. The Joint Parties propose to eliminate this short space by deleting channel 276C at Hurricane and allocating channel 276C to Kanab, UT for use by the New.C facility.

(b) **Channel 276C Hurricane, UT – Proposed channel 276C Kanab, UT.**

A New CP at Hurricane, UT is currently authorized to operate on channel 276C. The distance between the reference site of KPKK (on Ch 276C at Amargosa Valley) and the approved operation site of the Hurricane New CP is 234.66 kilometers while 290 kilometers are required to be fully spaced. This creates a prohibited short space of 55.34 kilometers. The Joint Parties propose to eliminate this short

space by deleting channel 276C at Hurricane and allocating channel 276C at Kanab. This is proposed as a replacement service to the deletion of that community's only local service (KPLD Ch 266C) as discussed above. Sub changes are required to allocate channel 276C at Kanab. **The Ch 276C allotment at Kanab requires sub changes that are the MX point between the NPRM and the Counterproposal.** The allocation of channel 276C at Kanab (using the Kanab community coordinates as allotment reference) eliminates the prohibited short spacing to the allotment reference of channel 276C at Amargosa Valley (KPKK). However; channel 276C at Kanab does create a prohibited short space to vacant channel 278C1 at Fredonia, AZ. The Joint Parties propose to provide a replacement service to Hurricane by deleting channel 260C at St. George, UT and allocating it to Hurricane for use by KONY.

**(1) CH 260C ST. George, UT, KONY - Proposed channel 260C Hurricane, UT.**

**REPLACEMENT SERVICE**

The Joint Parties propose to provide a licensed service at Hurricane by deleting channel 260C at St. George, UT and allocating channel 260C to Hurricane for use by KONY. This change in community of license for KONY will require no technical changes since KONY is currently fully spaced and provides both line of sight and

70 dBu coverage to Hurricane. There will be no other changes required since the coordinates will remain the same.

(2) **CH 278C1, Fredonia, AZ – Proposed channel 247C1 Fredonia, AZ.**

Presently, vacant channel 278C1 is allocated to Fredonia. Concern for a line of sight replacement to Kanab on channel 276C requires that the Joint Parties use the reference coordinates of such community for allocation purposes. The distance between the allotment reference for channel 276C at Kanab and channel 278C1 at Fredonia is 34.66 kilometers while 105 kilometers are required to be fully spaced. This creates a prohibited short space of 70.34 kilometers. The Joint Parties propose to eliminate this conflict by substituting channel 247C1 for channel 278C1 at the Fredonia allotment reference. This substitution requires only one additional spectrum modification.

a. **CH 247C, First Mesa, AZ – Proposed channel 237C First Mesa, AZ.**

Presently, vacant channel 247C is allocated to First Mesa. The substitution of channel 247C1 at Fredonia has spacing of 211.57 kilometers to the vacant allotment at First Mesa, while 270.0 kilometers are required to be fully spaced. This creates a prohibited short space of 58.43 kilometers. The Joint Parties propose to eliminate the conflict by substituting channel 237C

for channel 247C at the allotment reference coordinates of the vacant channel at First Mesa. This substitution requires only one additional spectrum modification.

(i) **CH 237C1, Teec Nos Pos, AZ – Proposed channel 278C2 Teec Nos Pos, AZ.**

Presently, a new CP is permitted to operate on channel 237C1 at Teec Nos Pos. The substitution of channel 237C for channel 247C at First Mesa has spacing of 167.95 kilometers to the Teec Nos Pos CP site, while 270.0 kilometers are required to be fully spaced. This creates a prohibited short space of 102.05 kilometers. The Joint Parties propose to eliminate the conflict by substituting channel 278C2 for channel 237C1 with a site modification at Teec Nos Pos. This substitution is in conflict the NPRM allotment of channel 279C at Church Rock (for use by KYVA), but not in conflict with the licensed site of KYVA. The distance between the proposed substitution of channel 278C2 at Teec Nos Pos and channel 279C at Church Rock is 157.32 kilometers while 188.0 kilometers are required to be fully spaced. This creates a prohibited short space of 30.68 kilometers. Detailed studies have been conducted to identify a substitute channel for Church Rock, but none are available that satisfy the current spacing requirements.

Therefore, **THE COUNTERPROPOSAL IS MUTUALLY  
EXCLUSIVE WITH THE NPRM'S PROPOSED  
ALLOTMENT AND MUST BE CONSIDERED  
ACCORDING TO THE COMMISSION'S ALLOTMENT  
PRIORITIES.**

This concludes the spectrum modifications required to implement the Counterproposal.

## **EXHIBITS EXPLAINED**

### **ADD Ch 262C1 Hanksville, UT**

Exhibit E, Figure 1 is an allotment study for the allocation of channel 262C1 at Hanksville, UT. The study demonstrates that the proposed allotment is fully spaced with all known existing and proposed FM facilities with the exception of the licensed site of channel 263C Monroe, UT. Exhibit E, Figure 2 is a 70 dBu contour map that depicts compliance with §73.215 of the Rules concerning 100% city grade coverage of the proposed community of license. Figure 3 is a white area study demonstrating that a new wide area service at Hanksville will provide a new first local aural service to 330 persons.

### **NEW.C (Monroe)**

Exhibit E, Figure 4 is an allotment study for the allocation of channel 264C at Enoch, UT. The study demonstrates that the proposed allotment is MX with the authorized site of the new CP at Monroe and that such proposed allotment satisfies all additional spacing once channel 266C is deleted at Kanab, UT (KPLD). Figure 5 is a 70 dBu contour map for a maximum class C. It shows that the allotment is in compliance with §73.315 concerning city grade service to the entire community of Enoch. Figure 6 is a gain/loss area map with population counts from the US Census Bureau 2000 census. Figure 7 is a remaining services map showing that no white area is created by the Counterproposal's deletion of channel 263 at Monroe.

### **New.C (Castle Dale) (Replacement service)**

Exhibit E, Figure 8 is an allotment study for the allocation of channel 271C at Monroe, UT. This is a replacement service for the permitted site (Monroe) and uses a modified site as reference.

The study demonstrates that the proposed allotment is MX with the CP site of Ch 271C2 Castle Dale and that it satisfies all spacing requirements. Figure 9 is a 70 dBu contour map for a maximum class C. It shows that the allotment is in compliance with §73.315 concerning city grade service to the entire community of Monroe. Figure 10 is a gain/loss area map with population counts from the US Census Bureau 2000 census. Figure 11 is a remaining services map showing that no white area is created by the Counterproposal's deletion of channel 271 at Castle Dale since channel 269C2 shall be subsequently added at Cleveland, UT (see below).

#### ADD 269C2 Cleveland, UT

Exhibit E, Figure 12 is an allotment study for the allocation of channel 269C2 at Cleveland, UT. The addition of this service shall provide continued potential service to residents of east central Utah and shall use the currently permitted site as reference. The study demonstrates (i) that the proposed allotment can be added as a result of the deletion of Ch 271C2 at Castle Dale and (ii) that it satisfies all spacing requirements. Figure 13 is a 70 dBu contour map for a class C2. It shows that the allotment is in compliance with §73.315 concerning city grade service to the entire community of Cleveland.

#### KPLD

Exhibit E, Figure 14 is an allotment study for the allotment of channel 266C at Indian Springs, NV for use by KPLD as it moves from Kanab, UT. The study demonstrates that channel 266C at Indian Springs is mutually exclusive with the licensed facility of KPLD at Kanab. This allotment is available only after KPKK is to be reassigned from channel 266C to channel 276C. The KPLD allotment satisfies all other spacing requirements. Figure 15 is a 70 dBu contour map for a maximum class C. It shows that the allotment is in compliance with §73.315 concerning



city grade service to the entire community of Indian Springs. Figure 16 is a gain/loss area map with population counts from the US Census Bureau 2000 census. Figure 17 is a remaining services map showing that no white area is created by the Counterproposal's deletion of channel 266C at Kanab. Presently Kanab has only one aural service; KPLD. The Joint Parties propose to provide seamless replacement service to Kanab by deleting channel 276C (CP) at Hurricane and allotting same to Kanab.

### KPKK

Exhibit E, Figure 18 is an allotment study for the substitution of channel 276C for channel 266C at Amargosa Valley, NV. The study demonstrates that channel 276C is available for the proposed substitution with one exception. It is short spaced to a New CP at Hurricane, UT. The allotment satisfies all additional spacing requirements once channel 276C is deleted at Hurricane and allocated as a replacement aural service at Kanab, UT. Figure 19 is a 70 dBu contour map for a maximum class C. It shows that the allotment is in compliance with §73.315 concerning city grade service to the entire community of Amargosa Valley. Figure 20 is gain/loss area map with population counts from the US Census Bureau 2000 census. A remaining services map is not required since the licensed KPKK 60 dBu service area (Ch 266C1, 51 KW at -15 meters HAAT) lies entirely within the proposed substitution of channel 276C and no community change for KPKK is proposed.

### Kanab, UT Ch 276C

Exhibit E, Figure 21 is an allotment study for the placement of channel 276C at the community reference coordinates of Kanab, UT. This allotment eliminates the short spacing between, channels 276C at Hurricane and channel 276C at Amargosa Valley, NV (KPKK) and provides

uninterrupted local service at Kanab as a result of the deletion of 266C (KPLD) from Kanab. Exhibit E, Figure 22 is a 70 dBu contour map for a maximum class C depicting 100% city grade coverage to the community of Kanab. Therefore, the proposed allotment is in compliance with §73.315 concerning city grade service to the entire community of Kanab. Figure 23 is a gain/loss area map with population counts from the US Census Bureau 2000 census. Figure 24 is a remaining services map showing that no white area is created by the Counterproposal's deletion of channel 287C at Hurricane. THIS ALLOTMENT BEGINS THE MX POINT OF THE JOINT PARTIES' COUNTERPROPOSAL AND THE INSTANT NPRM.

#### KONY

Exhibit E, Figure 25 is an allocations study for the allotment of channel 260C to Hurricane, UT as a replacement local service. Channel 260C is used by the licensed KONY. Exhibit E, Figure 26 is a 70 dBu contour map for a maximum class C. It demonstrates compliance with §73.315 concerning 100% city grade service to proposed community of license. No gain/loss map and remaining services studies are included since no technical modifications are proposed for the allotment of channel 260C to Hurricane.

#### VAC Ch 278C1 Fredonia, AZ

Exhibit E, Figure 27 is an allocations study showing that channel 247C1 can be substituted for channel 278C1 at the allocations reference site of VAC 278C1 at Fredonia, AZ. No additional supporting exhibits are needed for this substitution since it proposes to use the existing allotment reference coordinates of channel 278C1; therefore, the coverage will remain the same.

#### VAC 247C First Mesa, AZ

Exhibit E, Figure 28 is an allocations study showing that channel 237C can be substituted for channel 247C at the allocations reference site of VAC 247C at First Mesa, AZ. No additional supporting exhibits are needed for this substitution since it proposes to use the existing allocation reference coordinates of channel 247C; therefore, the coverage will remain the same.

#### Ch 237C1 Teec Nos Pos, AZ

Exhibit E, Figure 29 is an allocations study depicting that channel 278C2 can be substituted for channel 237C1 with a site modification at Teec Nos Pos, AZ. Figure 30 is a 70 dBu contour map for a maximum class C2. It shows that the allotment is in compliance with §73.315 concerning city grade service to the entire community of Teec Nos Pos. Figure 31 is a gain/loss area map with population counts from the US Census Bureau 2000 census. No loss area is shown since the permittee of channel 237C1 at Teec Nos Pos proposed to operate channel 237C1 as a minimal class C1 (100 KW at 50 meters HAAT). The Joint Parties propose to allocate New.C as a maximum class C2 on channel 278C2. Therefore, since no loss area is developed by the proposed channel and class substitution, a remaining services study is omitted. **THIS IS THE MUTUALLY EXCLUSIVE POINT BETWEEN THE COUNTERPROPOSAL AND THE NPRM.**

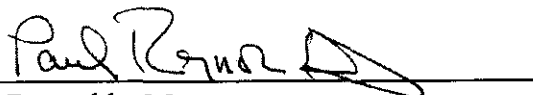
#### GAIN/LOSS STUDY

Exhibit E, Figure 28 is a compilation of the gain/loss studies in both population and land area. It depicts that the Counterproposal provides service to 330 persons in a white area, a new first local service to 2,383 persons, and a net gain in service to 205,511 persons in an area of 54,586 square kilometers.

## CONCLUSION

This engineering statement includes studies clearly documenting that the Counterproposal provides a superior method for obtaining maximum utilization of the spectrum while satisfying all of the current Commission rules concerning FM spectrum modifications. The Counterproposal does not create any white area, and the Counterproposal can be implemented with a minimum of spectrum interruption.

Respectfully Submitted,  
REYNOLDS TECHNICAL ASSOCIATES, LLC.

A handwritten signature in black ink, appearing to read "Paul Reynolds", is written over a horizontal line.

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## Engineering Statement

In Support of a

### Counterproposal

The Joint Parties

MB Docket 05-263, RM-11269

### Summary of Channel Assignments (Depicting all communities, channels, and modifications)

COMMUNITY	PRESENT	PROPOSED	COMMENTS
Hanksville, UT	----	262C1	Allocate Ch 262C1 to Hanksville as community's first local service. This allotment serves white area population of 330 people and gray area population of 9 people.
Enoch, UT	-----	264C (New.C)	Delete Ch 263C at Monroe and allot MX Ch 264C at Enoch (first local service). Delete Ch 271C2 and allot MX Ch 271C at Monroe as a replacement service.
Monroe, UT	263C	271C (New.C)	
Castle Dale, UT	271C2 (New.C)	-----	
Cleveland, UT	-----	269C2	Proposed facility at CP coordinates for channel 271C2 at Castle Dale.
Pioche, NV	255C	268C	Delete Ch 255C (KBZB) at Pioche and allocate Ch 255C at Moapa Valley to accommodate the allotment of Ch 256C at Ely (ADD).
Indian Springs, NV	257C0	257C0, 266C (KPLD)	Allocate Ch 266C at Indian Springs for use by KPLD.
Amargosa Valley, NV	266C	276C	Delete Channel 266C & substitute 276C for KPKK with an allotment reference change.
Hurricane, UT	276C (New.C)	260C (KONY)	Delete Ch 276C at Hurricane & allot MX Ch 276C at Kanab for New.C as a replacement service. Delete Ch 260C at St George, UT and allocate to Hurricane as a replacement service.
St. George, UT	260C (KONY), 291C2	291C2	
Kanab, UT	266C (KPLD)	276C (New.C)	
Fredonia, AZ	278C1 (VAC)	247C1 (VAC)	Delete Ch 278C1 at Fredonia & substitute channel 247C1 at Ch 278C1 allotment coordinates.
First Mesa, AZ	247C	237C	Substitute Ch 237C for Ch 247C at the current allocation site.
Teec Nos Pos, AZ	237C1 (New.C)	278C2 (New.C)	Delete Ch 237C1 at Teec Nos Pos & substitute channel 278C2 with a modification of site coordinates.

Table 1

# Engineering Statement

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## Counterproposal

The Joint Parties

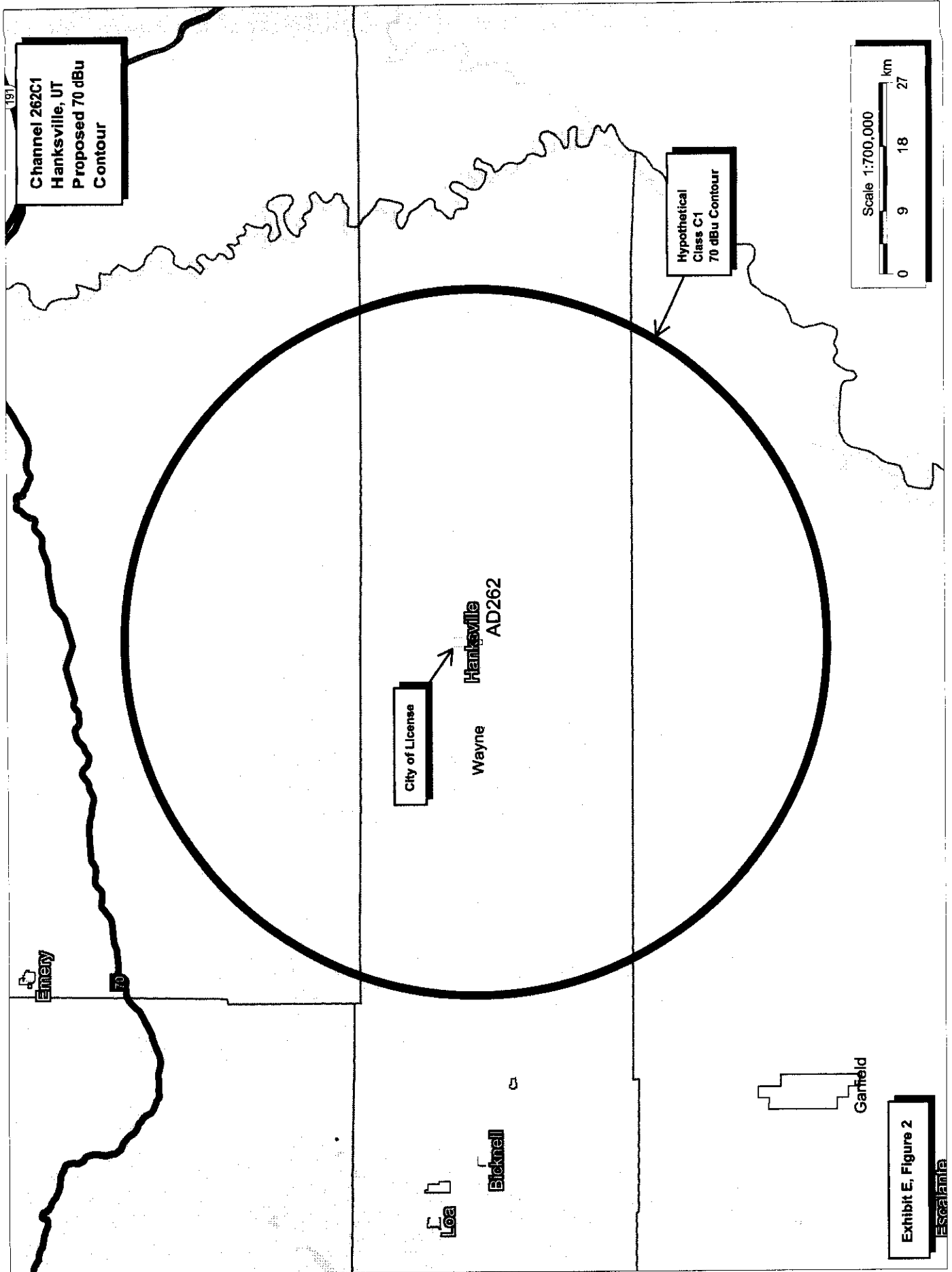
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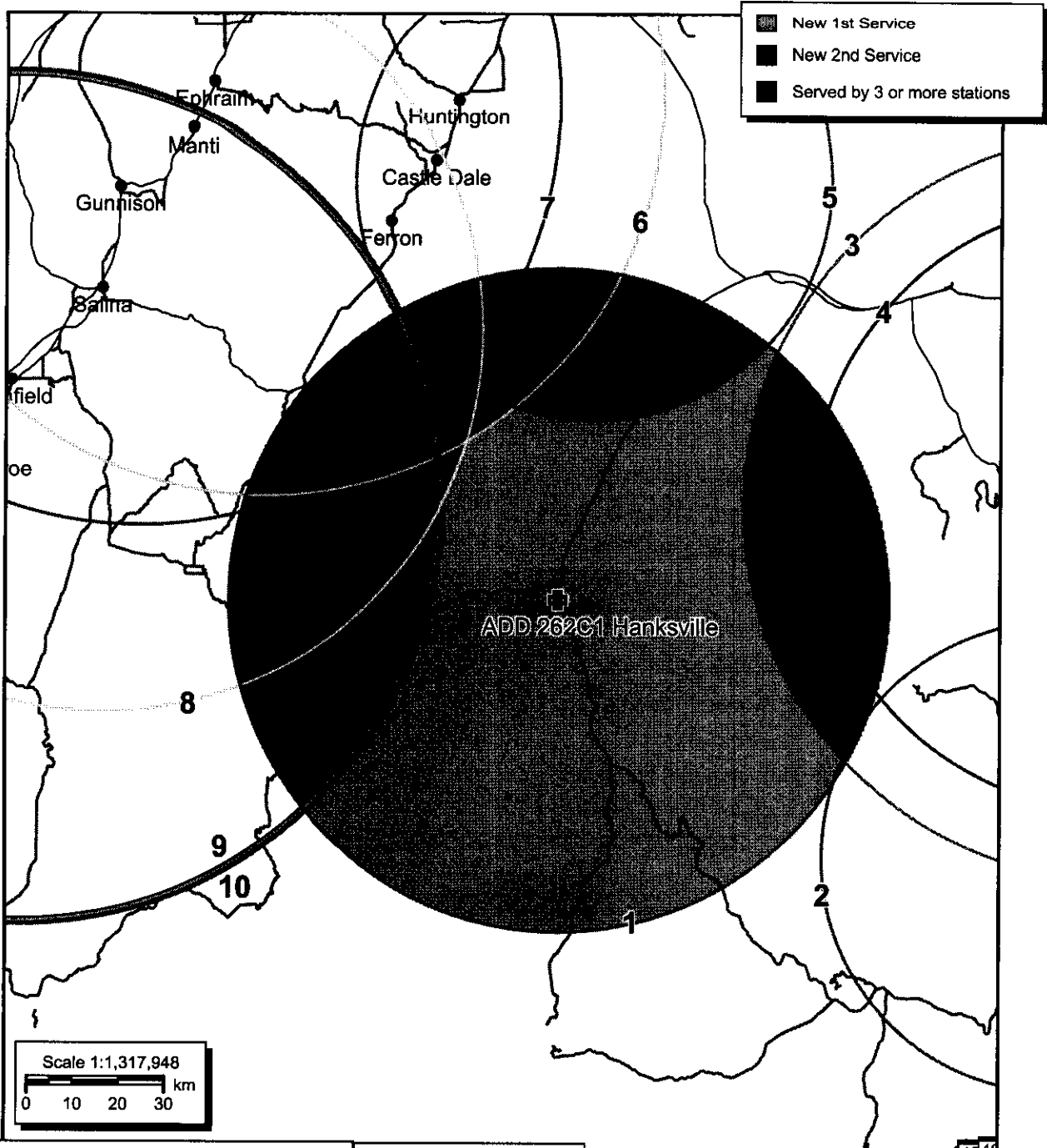
Allocation Study - Ch 262C1 at Hanksville, UT (ADD 262C1)

Adding Ch 262C1 to Hanksville as a first local service

(Using proposed allotment site coordinates as reference)

REFERENCE			CLASS = C1		DISPLAY DATES		
38 21 00 N			Current	Spacings	DATA	10-13-05	
110 42 20 W					SEARCH	10-15-05	
----- Channel 262 - 100.3 MHz -----							
Call	Channel	Location	Dist	Azi	FCC	Margin	
-----							
<b>Community of Hanksville</b>			<b>UT</b>	<b>2.61</b>	<b>345.5</b>		
Reference Coordinates:							
North Latitude: 38-22-22							
West Longitude: 110-42-47							
<b>NEW .C CP -N 263C</b>	<b>Monroe</b>		<b>UT</b>	<b>120.02</b>	<b>280.7</b>	<b>209.0</b>	<b>-88.98</b>
Of Concern:							
Proposed deletion of Ch 263C at Monroe and							
Allotment of New.C at Enoch, UT as that community's							
First aural service							
RADD	ADD	261A	Price	UT	133.00	355.9	133.0 0.00
KSFI	LIC	262C	Salt Lake City	UT	286.87	333.9	270.0 16.87
RDEL	DEL	265C2	Price	UT	131.76	2.7	79.0 52.76
KWSA	LIC	265A	Price	UT	133.00	355.9	75.0 58.00
KRSJ.C	CP -N 263C	Durango		CO	278.71	112.3	209.0 69.71
KRSJ.A	APP	263C	Durango	CO	278.71	112.3	209.0 69.71
KEKB	LIC	260C	Fruita	CO	187.91	64.3	105.0 82.91
KZMU	LIC	209A	Moab	UT	105.98	77.7	22.0 83.98
AL260	VAC	260A	Fountain Green	UT	163.38	330.7	75.0 88.38
-----							





Service Count Population Report -  
RADD 262C1 Gain Study  
Population Database: 2000 US Census (SF1)

	Service Pop
New 1st Service	330
New 2nd Service	9
New Service	630

#### ADD 262C1 Hanksville

Latitude: 38-21-00 N  
Longitude: 110-42-20 W  
ERP: 100.00 kW  
HAAT: 546.8 m  
Channel: 262 C1  
Frequency: 100.3 MHz  
AMSL Height: 1945.88 m  
Elevation: 1339.0 m  
Horiz. Pattern: Omni  
Vert. Pattern: No  
Prop Model: None

#### STATION KEY

- 1) RADD 262C1 Hanksville, UT (72.3 km)
- 2) KBDX Blanding, UT (51.7 km)
- 3) New.C 291C0 Monticello, UT (81.2 km)
- 4) KCYN Moab, UT (66.4 km)
- 5) ADD 269C2 Cleveland, UT (52.2 km)
- 6) KQMB 244C Levan, UT (87.2 km)
- 7) KLGL 229C (CP) Richfield, UT (91.8 km)
- 8) AL233C Salina, UT (83.4 km)
- 9) New.C 271C Monroe, UT (91.8 km)
- 10) KCYQ 249C Elsinore, UT (92.1 km)

Exhibit E, Figure 3



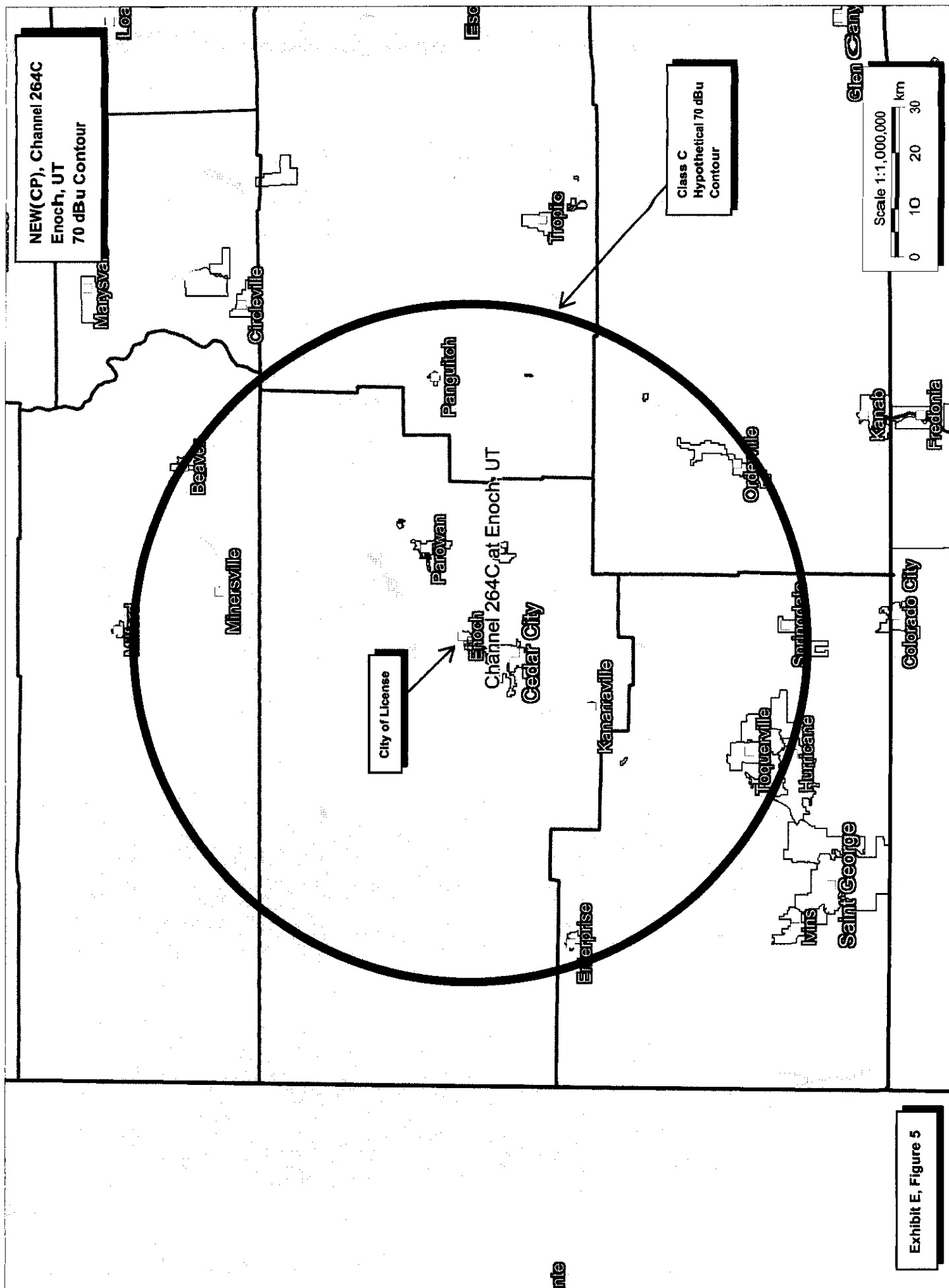
# Engineering Statement

In Support of a  
**Counterproposal**  
The Joint Parties

MB Docket 05-263, RM-11269

Allocation Study - Ch 264C at Enoch, UT (New.C 263C)  
Deleting Ch 263C at Monroe, UT and allocating Ch 264C to Enoch, UT  
(Using Enoch community coordinates as reference)

REFERENCE				DISPLAY DATES			
37 45 32 N				CLASS = C	DATA 10-13-05		
113 02 23 W	Current Spacings			SEARCH 10-15-05			
----- Channel 264 - 100.7 MHz -----							
Call	Channel	Location		Dist	Azi	FCC	Margin
-----							
<b>Community of Enoch</b>				<b>UT</b>	<b>0.0</b>	<b>0.0</b>	
Reference Coordinates:							
North Latitude: 37-45-32							
West Longitude: 113-02-23							
<b>NEW.C</b>	<b>CP-N</b>	<b>263C</b>	<b>Monroe</b>	<b>UT</b>	<b>122.25</b>	<b>44.3</b>	<b>209.0 -86.75</b>
Of No Concern							
CP site of New.C at Monroe before							
modification proposed in instant counterproposal							
Demonstrates authorized and proposed allotments are MX							
<b>KPLD</b>	<b>LIC</b>	<b>266C</b>	<b>Kanab</b>	<b>UT</b>	<b>54.26</b>	<b>161.3</b>	<b>105.0 -50.74</b>
<b>KPLD.C</b>	<b>CP -N</b>	<b>266C</b>	<b>Kanab</b>	<b>UT</b>	<b>54.26</b>	<b>161.3</b>	<b>105.0 -50.74</b>
Of Concern:							
Deletion of Ch 266C at Kanab and allotment							
Of Ch 266C at Indian Springs, NV proposed for							
KPLD at; NL: 36-41-33, WL: 115-58-04							
<b>KMZQFM</b>	<b>LIC</b>	<b>263C</b>	<b>Henderson</b>	<b>NV</b>	<b>261.63</b>	<b>222.5</b>	<b>241.0 20.63</b>
<b>RDEL</b>	<b>DEL</b>	<b>265C2</b>	<b>Price</b>	<b>UT</b>	<b>287.72</b>	<b>45.9</b>	<b>188.0 99.72</b>
<b>KWSA.C</b>	<b>CP -N</b>	<b>265C2</b>	<b>Price</b>	<b>UT</b>	<b>287.72</b>	<b>45.9</b>	<b>188.0 99.72</b>
-----							



Pop. Gain = 128,647  
Pop. Loss = 35,202  
Gain Area = 20,653 sq km  
Loss Area = 20,653 sq km

NEW(CP), Channel 264C  
Enoch, UT  
Gain/Loss Study

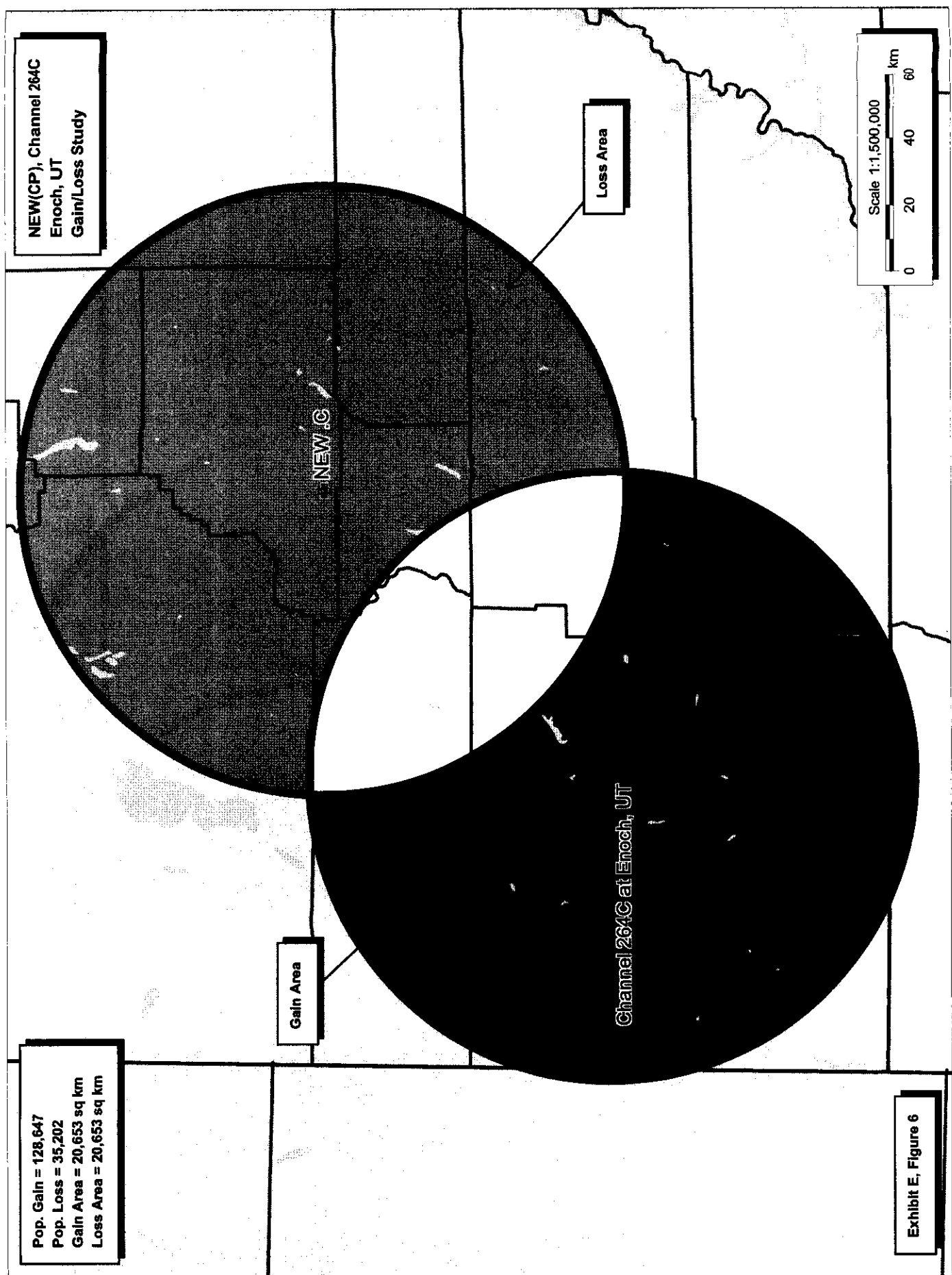


Exhibit E, Figure 6

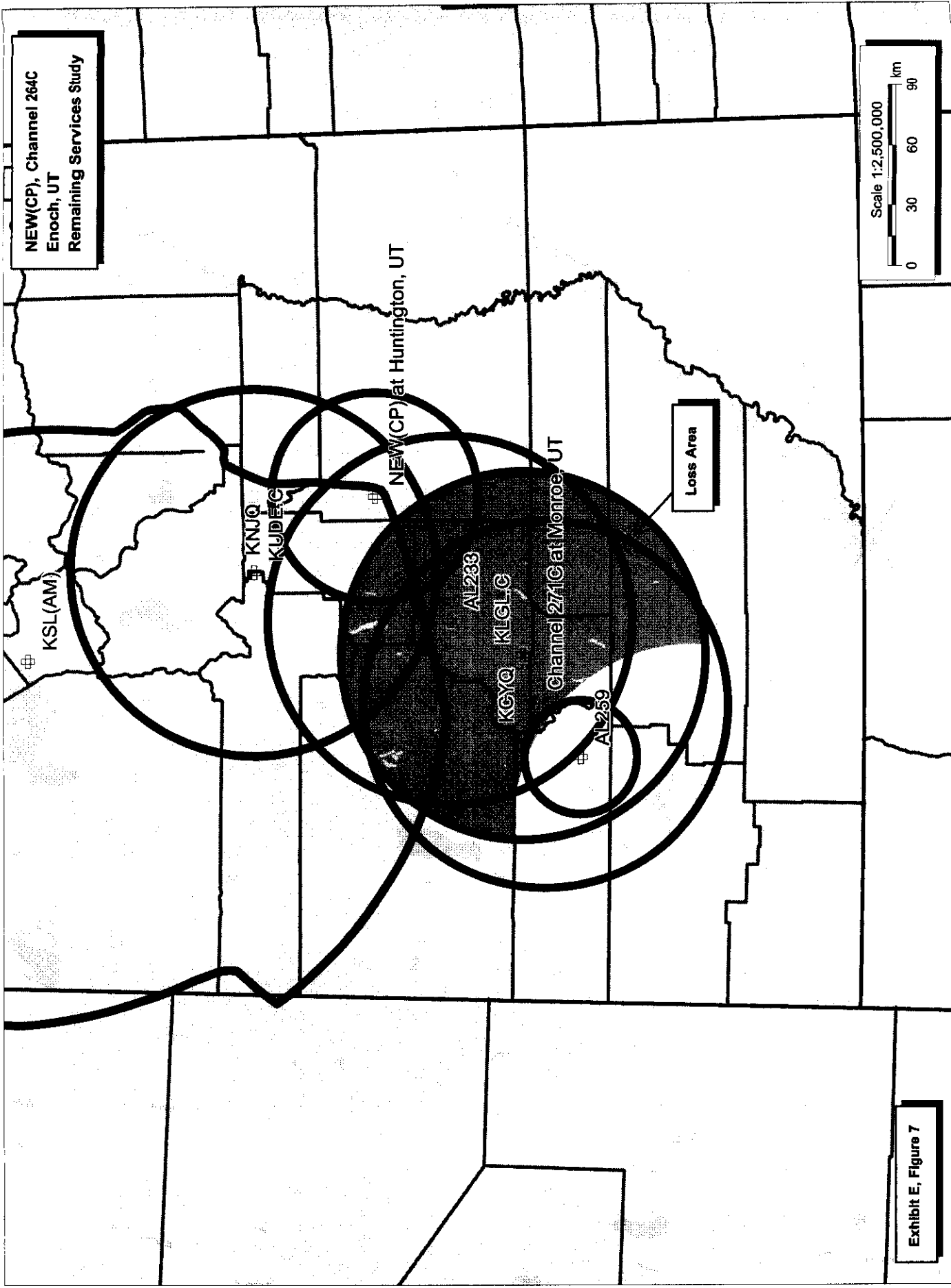


Exhibit E, Figure 7

# Engineering Statement

In Support of a

## Counterproposal

The Joint Parties

MB Docket 05-263, RM-11269

Allocation Study - Ch 271C at Monroe, UT (New.C)  
Allocating Ch 271C as replacement service for Ch 263C at Monroe, UT  
(Using modified allotment coordinates as reference)

REFERENCE				CLASS = C		DISPLAY DATES		
38 26 23 N				Current		DATA 10-13-05		
112 20 36 W				Spacings		SEARCH 10-15-05		
----- Channel 271 - 102.1 MHz -----								
Call	Channel	Location		Dist	Azi	FCC	Margin	
-----								
<b>Community of Monroe</b>				<b>UT</b>	<b>28.67</b>	<b>42.5</b>		
Reference Coordinates:								
North Latitude: 38-37-46								
West Longitude: 112-07-13								
<b>AL271</b>	<b>VAC</b>	<b>271C3</b>	<b>Castle Dale</b>	<b>UT</b>	<b>143.35</b>	<b>52.7</b>	<b>237.0</b>	<b>-93.65</b>
<b>NEW .C</b>	<b>CP</b>	<b>271C2</b>	<b>Castle Dale</b>	<b>UT</b>	<b>170.45</b>	<b>60.9</b>	<b>249.0</b>	<b>-78.55</b>
Of Note:								
Authorized facility and COL before								
proposed deletion and allocation to Monroe								
KPQP.C	CP	270C	Ogden	UT	246.74	2.8	241.0	5.74
KPQP	LIC	270C	Ogden	UT	246.77	2.8	241.0	5.77
KDUT	LIC	272C	Randolph	UT	293.70	22.7	241.0	52.70
<b>KCLS.P</b>	<b>PRO</b>	<b>268C</b>	<b>Pioche</b>	<b>NV</b>	<b>204.94</b>	<b>253.5</b>	<b>105.0</b>	<b>99.94</b>
Of Note:								
Allotment to Pioche for replacement								
signal for KBZB in parallel counterproposal at;								
NL: 37-53-44, WL: 114-34-41								
KVUW.C	CP	272C	Wendover	NV	353.53	328.2	241.0	112.53
KWID	LIC	270C	Las Vegas	NV	358.66	221.9	241.0	117.66
KVUW	LIC	272A	Wendover	NV	294.05	331.0	165.0	129.05
KQMB	LIC	274C	Midvale	UT	246.74	2.8	105.0	141.74
-----								

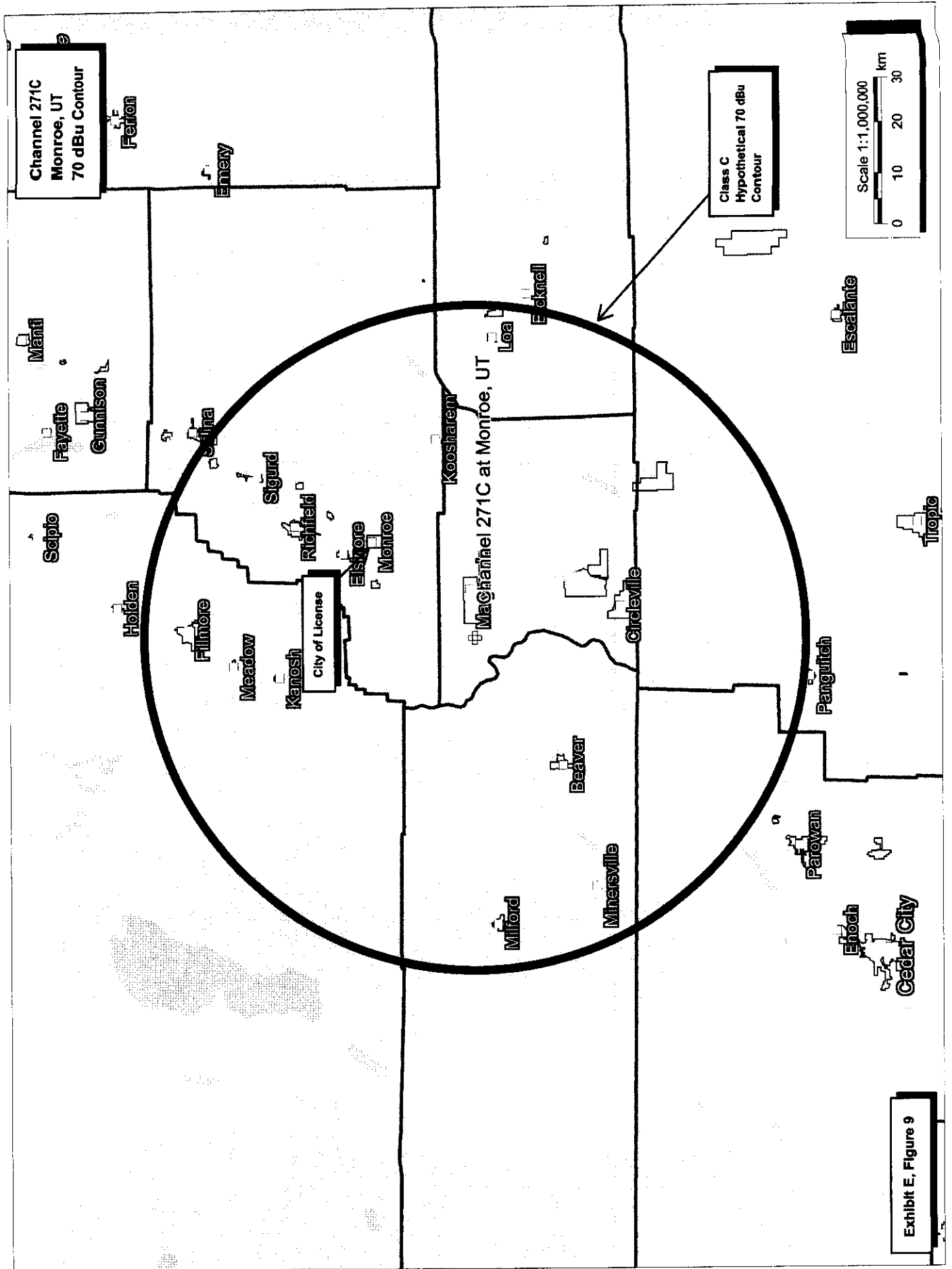
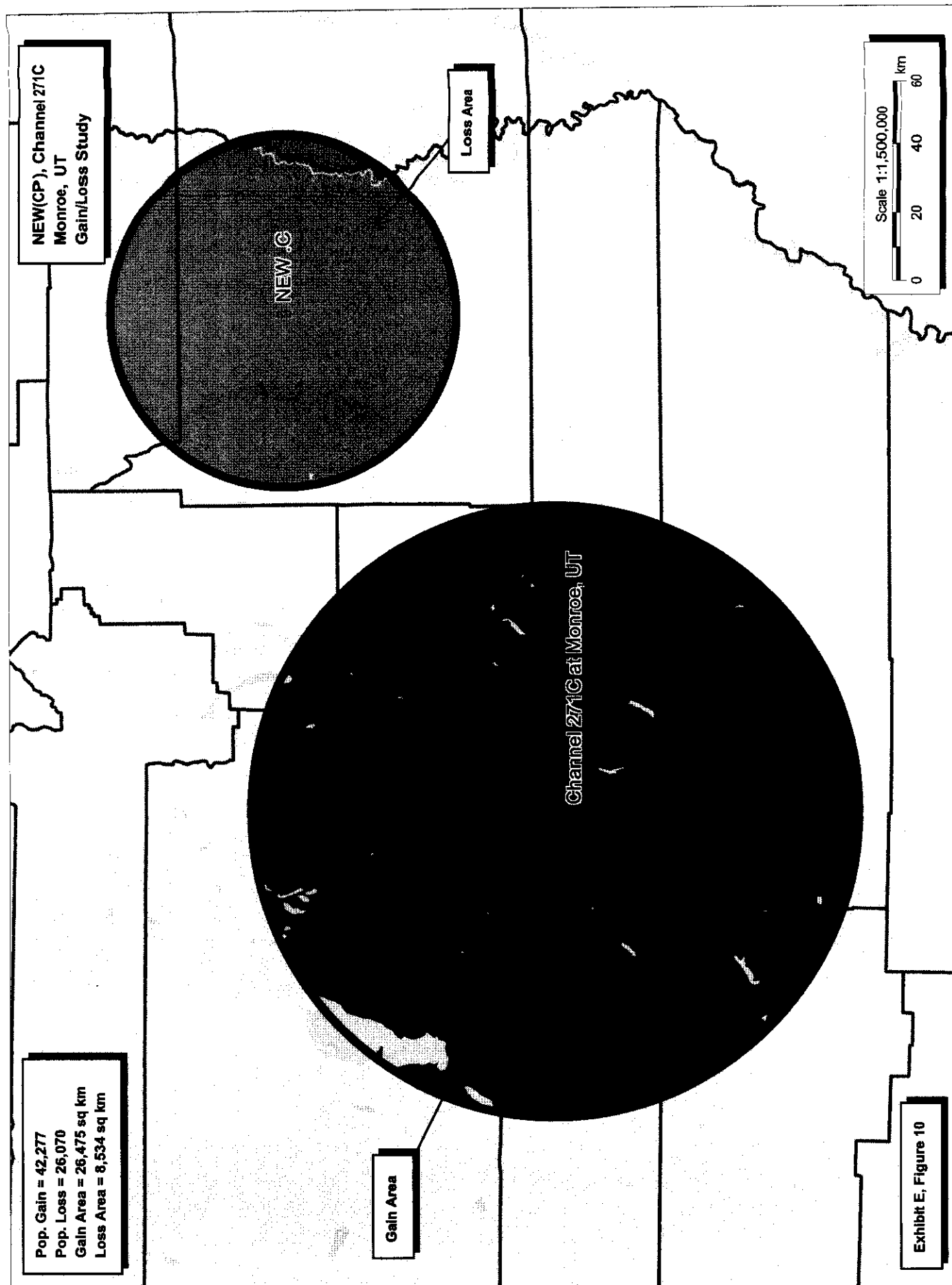


Exhibit E, Figure 9



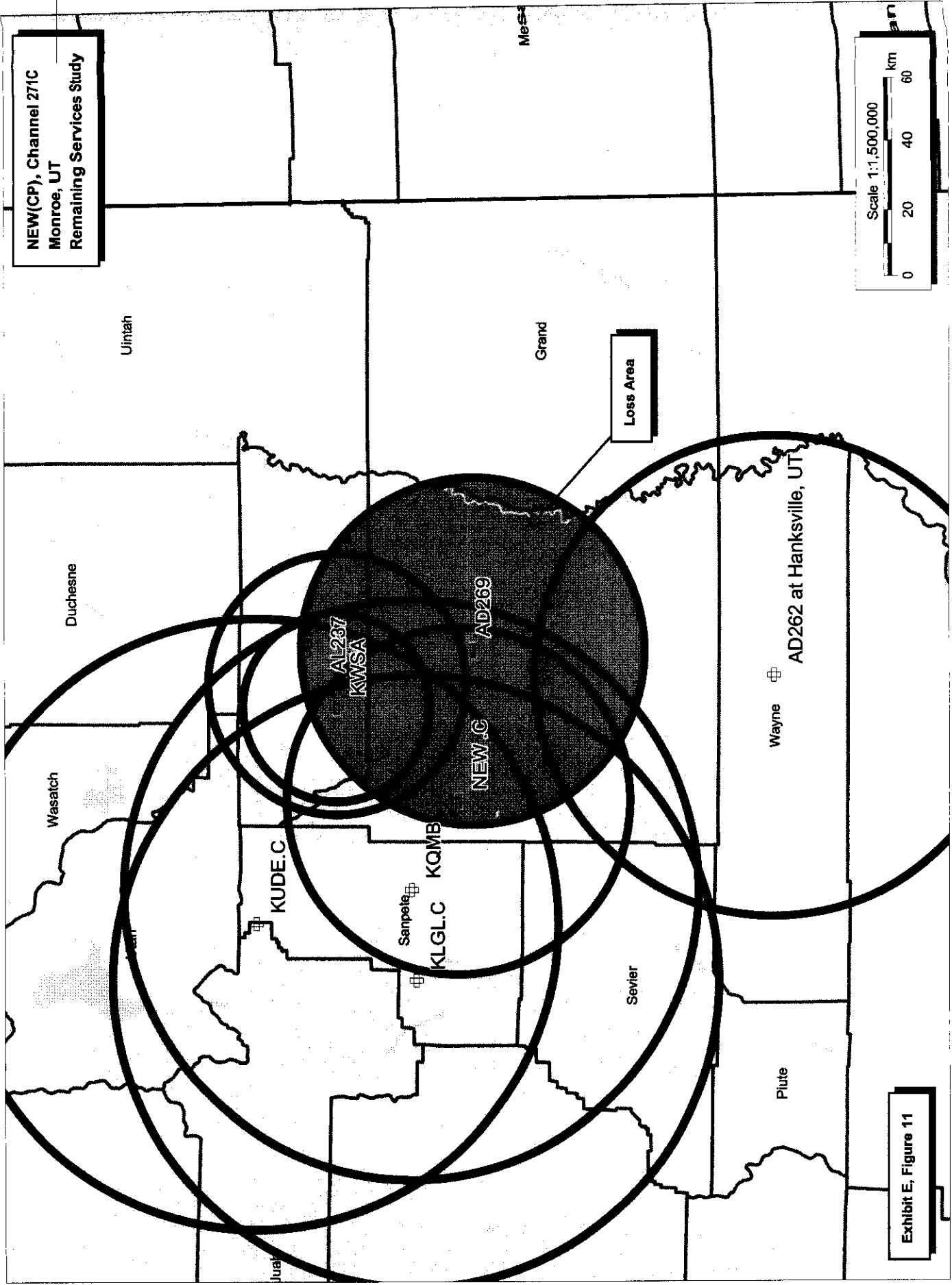


Exhibit E, Figure 11



# Engineering Statement

In Support of a

## Counterproposal

The Joint Parties

MB Docket 05-263, RM-11269

Allocation Study - Ch 269C2 at Cleveland, UT (ADD 269C2)

Allotting Ch 269C2 at Cleveland as first local service

(Using New.C Ch 271C2 Castle Dale CP authorization as reference)

REFERENCE				CLASS = C2		DISPLAY DATES		
39 10 19 N				Current		DATA 10-13-05		
110 37 07 W				Spacings		SEARCH 10-16-05		
----- Channel 269 - 101.7 MHz -----								
Call	Channel	Location		Dist	Azi	FCC	Margin	
<b>Community of Cleveland</b>				<b>UT</b>	<b>28.03</b>	<b>314.6</b>		
Reference Coordinates:								
North Latitude: 39-20-55								
West Longitude: 110-51-02								
<b>NEW .C</b>	<b>CP</b>	<b>271C2</b>	<b>Castle Dale</b>	<b>UT</b>	<b>0.00</b>	<b>0.0</b>	<b>58.0</b>	<b>-58.00</b>
<b>AL271</b>	<b>VAC</b>	<b>271C3</b>	<b>Castle Dale</b>	<b>UT</b>	<b>35.12</b>	<b>277.7</b>	<b>56.0</b>	<b>-20.88</b>
Of No Concern:								
Deletion of Ch 271C2 at Castle Dale								
And subsequent allotment of Ch 271C at Monroe								
Proposed in instant counterproposal								
See Ch 271C at Monroe below								
KEGA	LIC	268C	Oakley	UT	191.38	350.5	188.0	3.38
KENZ	LIC	270C	Ogden	UT	213.52	321.3	188.0	25.52
<b>ADD.P</b>	<b>PRO</b>	<b>271C</b>	<b>Monroe</b>	<b>UT</b>	<b>188.24</b>	<b>233.8</b>	<b>105.0</b>	<b>83.24</b>
Of Note:								
After deletion of Ch 271C1 at Castle Dale, UT								
Allotment of Ch 271C at Monroe, UT proposed at;								
NL: 38-26-23, WL: 112-20-36								
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